Wheel A

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - - - - - - - - - - - - - - x

UNITED STATES OF AMERICA

- v. -

TARAMATIE PERSAUD,

Defendant.

- - - - - - - - - - - - - - - - - - x

INDICTMENT

15 Cr. 15 CRIM 633

COUNT ONE

(Forged Postal Money Orders)

The Grand Jury charges:

1. From at least in or about January 2012 up to and including at least in or about October 2014, in the Southern District of New York and elsewhere, TARAMATIE PERSAUD, the defendant, did transmit, present, and cause to be transmitted and presented, money orders and postal notes, knowing the same to contain material alterations therein unlawfully made, with intent to defraud the United States, the Postal Service, and another person, to wit, PERSAUD cashed and deposited altered postal money orders.

(Title 18, United States Code, Sections 500 and 2.)

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COUNT TWO

(Wire Fraud)

The Grand Jury further charges:

2. From at least in or about January 2012 up to and including at least in or about October 2014, in the Southern District of New York and elsewhere, TARAMATIE PERSAUD, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, PERSAUD defrauded her employer of approximately $448,000, and caused approximately $42,000 of the proceeds to be wired to accounts in Guyana.

(Title 18, United States Code, Sections 1343 and 2.)

FORFEITURE ALLEGATION

3. As the result of committing the offense alleged in Count Two of this Indictment, TARAMATIE PERSAUD, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and

personal, that constitutes or is derived from proceeds traceable to the commission of the offense.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

FOREPERSON

PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

TARAMATIE PERSAUD,

Defendant.

INDICTMENT

15 Cr.

(18 U.S.C. §§ 500, 1343, and 2.)

PREET BHARARA
United States Attorney

[signature]
Foreperson